



Sullivan & Worcester LLP
1633 Broadway
New York, NY 10019

212 660 3000
sullivanlaw.com

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By E-Filing

Honorable Deborah A. Batts
United States District Court
United States Courthouse
500 Pearl Street, Room 2510
New York, NY 10007

**Re: L & Leung Leatherware Limited v. Collection XIIX Ltd. and Lisa Nunziata
17 Civ. 7374 (DAB)(GWG)**

Dear Judge Batts:

We represent plaintiff L & Leung Leatherware Limited (“Plaintiff” or “Leung Leatherware”) in the above-referenced matter. We write on behalf of all counsel to request an extension of the time for the parties to submit Proposed Requests to Charge and Proposed Voir Dire, the Joint Pretrial Statement (“JPTS”), and the Memorandum of Law Addressing Issues in JPTS (collectively, the “JPTS Materials”), currently due on August 23, 2019, to a reasonable time after a pre-motion conference is held, or a motion schedule set, on each parties’ respective proposed motions for summary judgment.

By way of background, discovery is complete in this matter. Pursuant to Your Honor’s Individual Practices at II(B)(2), each party timely informed the Court of their respective intentions to move for summary judgment on June 28, 2019 (DE 51 and 52), timely submitted letters stating the proposed bases for summary judgment on July 8, 2019 (DE 53 and 54), and timely submitted response letters on July 18, 2019 (DE 55 and 56).

Each party respectfully submits that summary judgment may dispose of, or at least narrow, a number of the issues that would otherwise need be addressed in the JPTS Materials. Accordingly, the parties respectfully request, in the interests of judicial economy and the saving of time and expense for the parties, that the deadline for the JPTS Materials be adjourned until a reasonable time after the Court has had the opportunity to address the proposed motions for summary judgment, whether at a pre-motion conference or by issuing a motion schedule.

This Court has previously granted the parties’ joint requests for extension of the discovery deadlines by orders dated September 4, 2018 (DE 33), November 6, 2018 (DE 35), January 3, 2019 (DE 37), February 26, 2019 (DE 44) and March 21, 2019 (DE 50). The parties note that, in the Order dated March 21, 2019, the Court ordered that there would be no further extensions after May 6, 2019. However, the parties respectfully submit, given that the parties completed discovery by the deadline of May 13, 2019, timely followed the Court’s Individual

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Practices for proposing motions for summary judgment, and are awaiting guidance from the Court thereon, that a reasonable extension of time to file the JPTS Materials until after the letters proposing summary judgment can be addressed by the Court.

The parties respectfully request at least a 60 day extension of the time to file the JPTS Materials, but of course defer to the Court as to the best manner of addressing the scheduling issues set forth herein.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Gerry Silver

Gerry Silver

Direct line: 212-660-3096

gsilver@sullivanlaw.com

cc: Khalilah_Williams@nysd.us.courts.gov (By Email)

Mathura_Sridharan@nysd.us.courts.gov